

**PAULA T. DOW**

Attorney General of New Jersey  
Attorney for Complainant  
State of New Jersey  
Department of Law and Public Safety  
Division of Gaming Enforcement  
1300 Atlantic Avenue  
Atlantic City, New Jersey 08401

By: R. Lane Stebbins  
Deputy Attorney General  
(609) 317-6218

STATE OF NEW JERSEY  
DIVISION OF GAMING ENFORCEMENT  
DOCKET NO. 11-1451-VC

STATE OF NEW JERSEY, DEPARTMENT	)	
OF LAW AND PUBLIC SAFETY,	)	
DIVISION OF GAMING ENFORCEMENT,	)	
	)	
Complainant,	)	Civil Action
	)	
v.	)	COMPLAINT
	)	
BALLYS PARK PLACE, INC. d/b/a	)	
BALLYS PARK PLACE HOTEL & CASINO	)	
	)	
Respondent.	)	
	)	

Complainant, State of New Jersey, Department of Law and Public Safety,  
Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic  
City, New Jersey, 08401 says:

**COUNT I**  
**(Emergency Containers)**

1. Respondent, BALLY'S PARK PLACE, INC d/b/a BALLY'S ATLANTIC CITY ("Bally's") is a New Jersey corporation having its principal place of business at Park Place and the Boardwalk, Atlantic City, New Jersey 08401.

2. Bally's is the holder of a casino license first issued on or about December 29, 1980 and most recently renewed effective June 30, 2008. At all times relevant herein, Bally's was authorized to conduct casino gaming within its casino hotel facility, and, specifically its Bally's Park Place facility.

3. N.J.A.C. 13:69D-1.16(d) provides, in pertinent part, that:

.....When put into use, emergency drop boxes shall be temporarily marked with the number of the gaming table. The casino licensee shall notify the Division and the surveillance department contemporaneously with placing an emergency drop box into use.

4. As set forth below, N.J.A.C. 13:69D-1.42(n) provides, in pertinent part, that a casino licensee must notify both the Division and its surveillance department when an emergency slot cash storage box is to be put into use. This requirement was formerly set forth in N.J.A.C. 13:69D-1.16(b)5.

A full or inoperable slot drop box or slot cash storage box that must be replaced outside of the slot drop schedule shall be replaced with an empty emergency slot drop box or slot cash storage box by a security department member and a slot or cage supervisor as follows:

1. A security department member shall notify the surveillance department which shall monitor and record

the transaction. If more than one slot drop box or slot cash storage box is being removed, such notification shall include the sequence in which the boxes will be removed and replaced;

5. The emergency box form shall be distributed by the security department member as follows:

- i. Original affixed to the emergency slot drop box or slot cash storage box;
- ii. Duplicate placed in a locked accounting box; and
- iii. Triplicate delivered within twenty four hours of preparation to the Division's onsite office;

5. When it intends to put an emergency container into use, Bally's utilizes a form, known as an emergency box slip, to notify the Division.

6. By e-mail dated April 18, 2011, the Division, in the absence of notification from Bally's, requested documentation of emergency drop boxes and slot cash storage boxes being put into use. On April 19, 2011, Bally's provided the requested documentation which indicated that between March 18, 2011 and April 19, 2011, it utilized emergency drop boxes and slot cash storage boxes on 301 occasions.

7. By e-mail dated May 11, 2011, the Division, in the absence of notification from Bally's, requested documentation of emergency drop boxes and slot cash storage boxes being put into use. On May 11, 2011, Bally's provided the requested documentation which indicated that between April 28, 2011 and May 11, 2011, it utilized emergency drop boxes or slot cash storage boxes on 70 occasions.

8. Based upon a comparison of emergency drop box notifications and surveillance logs, between September 1, 2011 and September 15, 2011, Bally's failed to contemporaneously notify its surveillance department on 22 occasions that it was putting emergency drop boxes or slot cash storage boxes into use.

9. Based upon a comparison of surveillance logs and emergency drop box notifications, between September 1, 2011 and September 15, 2011, Bally's failed to contemporaneously notify the Division on 11 occasions that it was putting emergency drop boxes into use.

10. Based upon the conduct described in Paragraphs 1 through 9 of this Complaint, Bally's, failed to contemporaneously notify the Division on 382 occasions that it was putting emergency boxes or slot cash storage boxes into use, in violation of N.J.A.C. 13:69D-1.16(d) and N.J.A.C. 13:69D-1.42(n).

11. Based upon the conduct described in Paragraphs 1 through 9 of this Complaint, Bally's, failed to contemporaneously notify its surveillance department on 22 occasions that it was putting emergency drop boxes or slot cash storage boxes into use, in violation of N.J.A.C. 13:69D-1.16(d) and N.J.A.C. 13:69D-1.42(n).

WHEREFORE, Complainant demands the following relief against Respondent, BALLY'S PARK PLACE, INC d/b/a BALLY'S PARK PLACE:

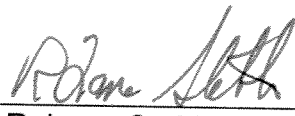
A. Judgment that Bally's failed to contemporaneously notify the Division on 382 occasions that it was putting emergency drop boxes or slot cash storage boxes into use, in violation of N.J.A.C. 13:69D-1.16(d) and N.J.A.C. 13:69D-1.42(n);

B. Judgment that Bally's failed to contemporaneously notify its surveillance department on 22 occasions that it was putting emergency drop boxes or slot cash storage boxes into use, in violation N.J.A.C. 13:69D-1.16(d) and N.J.A.C. 13:69D-1.42(n);

C. Judgment imposing an appropriate monetary penalty pursuant to N.J.S.A. 5:12-129(5) upon Bally's for said violations; and,

D. Judgment imposing such other relief as may be just and appropriate.

Respectfully submitted,  
**PAULA T. DOW**  
Attorney General of New Jersey  
Attorney for Complainant

By:   
R. Lane Stebbins  
Deputy Attorney General

*November 2, 2011*